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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE META PIXEL TAX FILING CASES

Master File No. 3:22-cv-07557 (SI)

**JOINT STIPULATION AND [PROPOSED]  
ORDER RE: MOTION TO DISMISS AND  
CLASS CERTIFICATION BRIEFING  
SCHEDULES**

This document relates to:

All Actions

Date: October 27, 2023

Time: 10:00 a.m.

Location: Zoom

Judge: Honorable Judge Susan Illston

Pursuant to Civil Local Rules 6-1(b), 6-2, 7-12, and the Civil Minutes from the June 30, 2023 Initial Case Management Conference (ECF No. 99), Plaintiffs and Defendant Meta Platforms, Inc. (“Meta”) by and through their respective counsel of record, respectfully submit this stipulation and proposed order regarding the briefing schedules for Meta’s anticipated Motion to Dismiss and Plaintiffs’ anticipated Motion for Class Certification.

WHEREAS, Plaintiffs filed their Consolidated Class Action Complaint on May 15, 2023 (ECF No. 71); and

WHEREAS, in its February 9, 2023 Order, the Court set a briefing schedule for Meta’s Motion to Dismiss, under which order Meta’s Motion to Dismiss is due by July 14, 2023, the opposition is due by August 28, 2023, and the reply is due by September 27, 2023 (ECF No. 30); and

WHEREAS, on June 30, 2023, following the Initial Case Management Conference in this action, the Court set certain deadlines and “instructed the parties to meet and confer to submit a jointly agreed upon schedule” for the briefing regarding Meta’s anticipated Motion to Dismiss and Plaintiffs’ anticipated Motion for Class Certification (ECF No. 99); and

WHEREAS, the parties have met and conferred and have come to an agreement on a proposed schedule;

NOW THEREFORE, the parties hereby stipulate subject to the approval of this Court, that:

1. The schedule for Meta’s Motion to Dismiss and Plaintiffs’ Motion for Class Certification is as follows:

Event	Deadline
Opening Motion to Dismiss Due	July 27, 2023
Opposition to Motion to Dismiss Due	September 12, 2023
Reply in Support of Motion to Dismiss Due	October 13, 2023
Hearing on Motion to Dismiss	October 27, 2023 at 10:00 a.m.
Motion for Class Certification and Class Expert Reports Due	July 25, 2024
Opposition to Class Certification and Class Expert Reports Due	September 30, 2024
Class Certification Reply and Class Expert Reply Reports Due	October 30, 2024
Hearing on Class Certification	November 15, 2024 at 10:00 a.m.

1 Dated: July 13, 2023

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2 By: /s/ Lauren R. Goldman  
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**CIVIL L.R. 5-1(h)(3) ATTESTATION**

Pursuant to Civil Local Rule 5-1(h)(3), I, Lauren R. Goldman, hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.

Dated: July 13, 2023

By: /s/ Lauren R. Goldman

**[PROPOSED] ORDER****PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:**

The schedule for Defendant Meta Platforms, Inc.'s Motion to Dismiss and Plaintiffs' Motion for Class Certification is as follows:

Event	Deadline
Opening Motion to Dismiss Due	July 27, 2023
Opposition to Motion to Dismiss Due	September 12, 2023
Reply in Support of Motion to Dismiss Due	October 13, 2023
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Hearing on Class Certification	November 15, 2024 at 10:00 a.m.

Dated: July \_\_, 2023

\_\_\_\_\_  
Honorable Susan Illston  
United States District Court Judge